

**EXHIBIT 5**

**FILED UNDER SEAL**

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

---

FAIR ISAAC CORPORATION,

Court File No. 16-cv-1054 (WMW/DTS)

Plaintiff,

v.

FEDERAL INSURANCE COMPANY,  
an Indiana corporation, and ACE  
AMERICAN INSURANCE COMPANY, a  
Pennsylvania corporation,

**FEDERAL INSURANCE COMPANY'S  
SEVENTH SUPPLEMENTAL  
ANSWER TO PLAINTIFF'S  
INTERROGATORY NO. 17**

Defendants.

---

To: Plaintiff and its attorneys, Allen Hinderaker, Heather Kliebenstein and Michael A. Erbele, Merchant & Gould P.C., 3200 IDS Center, 80 South Eighth Street, Minneapolis, MN 55402.

Defendant Federal Insurance Company ("Federal"), for its Seventh Supplemental Answer to Plaintiff's Interrogatory No. 17, states and alleges as follows:

**GENERAL RESPONSES**

1. Federal objects to the Definitions and Instructions to the extent that they seek to impose obligations on Federal that either exceed, or are different from, what is required under the Federal Rules of Civil Procedure, District of Minnesota Local Rules, and the Stipulated E-Discovery Order.

2. Federal objects to the requests to the extent that they seek information protected from discovery under the attorney-client privilege or work product doctrine.

3. Federal's responses and objections are made to the best of Federal's present knowledge, information, and belief. Federal's responses and objections are limited to information within its possession, custody, or control. Federal reserves the right to amend,

supplement, or change any responses and objections if and when additional, different, or more accurate information becomes available and/or facts are developed.

4. Federal gives these Responses subject to all objections to admissibility that may be interposed in this proceeding.

#### **SEVENTH SUPPLEMENTAL ANSWER TO INTERROGATORY NO. 17**

**INTERROGATORY NO. 17:** For all insurance policies in connection with which the Blaze Advisor® software was used, the gross written premium of Defendants and the gross written premium of each related company, including the specific identification of each related company, for each quarter from March 30, 2016 to date. For clarity, this Interrogatory is not seeking investment income, other income, or capital and surplus accounts.

**SUPPLEMENTAL ANSWER:** Federal objects to the request for “all” insurance policies as overbroad, unduly burdensome, and not proportional to the needs of this case. Federal also objects to this Interrogatory as compound and impermissibly constituting multiple interrogatories, which are limited in number under the Federal Rules. Federal also objects to this Interrogatory as vague and ambiguous in failing to identify the relevant “use” and calling for insurance policies “in connection with.” Federal further objects to this Interrogatory because “the gross written premium” of Defendants and the “gross written premium of each related company” are not relevant to any claim or defense in this action, including because Defendants’ profits are not reasonably related to the alleged infringement, as is necessary for FICO to obtain an award of the defendants’ profits. *See, e.g., Francois v. Ruch*, 2006 WL 3735950, at \*3 (C.D. Ill. Dec. 15, 2006). Federal further objects to the extent the Interrogatory seeks information not in the possession, custody, or control of Federal, and thus exceeds the scope of discovery under Federal Rule 26(b)(1).

Subject to, and without waiving these objections, Federal states the following:

- For the Financial Lines Unit (post-merger) for the years identified below, the following applications use Blaze Advisor® software: CSI Express, Decision Point, Automated Renewal Process, Profitability Indicator, and Defined Book Run. The approximate gross

written premiums, policy counts, and identification of the insurance writing companies that issued insurance policies that used these applications, in connection with which the Blaze Advisor® software was used, is provided in the charts below for the years requested.

- For Decision Point (DP):

| Year / Writing Company | Gross Written Premium | Policy Count   |
|------------------------|-----------------------|----------------|
| <b>2019</b>            | <b>\$1,347,731.00</b> | <b>466.00</b>  |
| CICNJ                  | \$80,257.00           | 19.00          |
| ERII                   | \$14,133.00           | 1.00           |
| FIC-D                  | \$1,253,341.00        | 446.00         |
| <b>2018</b>            | <b>\$4,814,337.77</b> | <b>1697.00</b> |
| CICNJ                  | \$236,749.00          | 71.00          |
| ERII                   | \$34,899.00           | 5.00           |
| FIC-D                  | \$4,542,689.77        | 1621.00        |
| <b>2017</b>            | <b>\$4,319,855.92</b> | <b>1447.00</b> |
| CICNJ                  | \$319,436.68          | 82.00          |
| ERII                   | \$34,636.00           | 3.00           |
| FIC-D                  | \$3,965,783.24        | 1362.00        |
| <b>2016</b>            | <b>\$3,547,608.80</b> | <b>1162.00</b> |
| CICNJ                  | \$182,249.80          | 43.00          |
| ERII                   | \$5,465.00            | 1.00           |
| FIC-D                  | \$3,359,894.00        | 1118.00        |

- For CSI eXPRESS (CSIX), Automated Renewal Process (ARP), Profitability Indicator (PI), and Defined Book Run (DBR):

| Year / Writing Company              | Gross Written Premium     | Policy Count |
|-------------------------------------|---------------------------|--------------|
| <b>2016</b>                         | <b>\$1,526,511,534.36</b> | <b>90555</b> |
| <b>CSIX/ARP/PI</b>                  | <b>\$1,444,514,455.23</b> | <b>82191</b> |
| CICNJ                               | \$21,543,942.90           | 1893         |
| ERII                                | \$74,655,072.17           | 5326         |
| ERSIC                               | \$31,403,417.00           | 1466         |
| FIC-D                               | \$1,210,424,578.61        | 68552        |
| PACIFICPI                           | \$150,747.00              | 64           |
| VIG-D                               | \$7,425,581.00            | 98           |
| CICC-CN                             | \$98,911,116.55           | 4792         |
| <b>New Business PI excluding DP</b> | <b>\$81,997,079.13</b>    | <b>8364</b>  |
| CICNJ                               | \$2,212,095.00            | 268          |
| ERII                                | \$492,570.48              | 52           |
| ERSIC                               | \$1,026,440.46            | 72           |
| FIC-D                               | \$75,579,124.19           | 7694         |
| PACIFICPI                           | \$206,637.00              | 34           |
| CICC-CN                             | \$2,480,212.00            | 244          |
| <b>2017</b>                         | <b>\$1,462,910,856.49</b> | <b>91631</b> |

| Year / Writing Company              | Gross Written Premium     | Policy Count |
|-------------------------------------|---------------------------|--------------|
| <b>CSIX/ARP/PI</b>                  | <b>\$1,351,871,992.43</b> | <b>82188</b> |
| CICNJ                               | \$20,940,256.13           | 1999         |
| ERII                                | \$62,459,326.84           | 4808         |
| ERSIC                               | \$28,856,329.46           | 1389         |
| FIC-D                               | \$1,132,709,567.53        | 69042        |
| PACIFICPI                           | \$331,853.03              | 86           |
| VIG-D                               | \$6,697,327.00            | 71           |
| CICC-CN                             | \$99,877,332.44           | 4793         |
| <b>New Business PI excluding DP</b> | <b>\$111,038,864.06</b>   | <b>9443</b>  |
| CICNJ                               | \$2,916,920.00            | 250          |
| ERII                                | \$441,480.80              | 23           |
| ERSIC                               | \$1,256,712.58            | 93           |
| FIC-D                               | \$101,305,050.77          | 8483         |
| PACIFICPI                           | \$262,033.00              | 44           |
| VIG-D                               | \$3,346.00                | 1            |
| CICC-CN                             | \$4,853,320.91            | 549          |
| <b>2018</b>                         | <b>\$1,406,041,567.67</b> | <b>93653</b> |
| <b>CSIX/ARP/PI</b>                  | <b>\$1,268,911,770.98</b> | <b>82523</b> |
| CCIC                                | \$3,309,818.00            | 195          |
| CICNJ                               | \$22,833,376.00           | 2098         |
| ERII                                | \$49,158,127.00           | 4254         |
| ERSIC                               | \$11,370,649.00           | 797          |
| FIC-D                               | \$1,084,053,466.78        | 70090        |
| PACIFICPI                           | \$384,509.00              | 55           |
| VIG-D                               | \$5,071,070.00            | 53           |
| CICC-CN                             | \$92,730,755.20           | 4981         |
| <b>New Business PI excluding DP</b> | <b>\$137,129,796.69</b>   | <b>11130</b> |
| CCIC                                | \$1,210,985.00            | 46           |
| CICNJ                               | \$3,180,349.00            | 376          |
| ERII                                | \$10,429.00               | 4            |
| ERSIC                               | \$1,377,654.00            | 100          |
| FIC-D                               | \$126,368,941.69          | 10050        |
| PACIFICPI                           | \$101,678.00              | 21           |
| CICC-CN                             | \$4,879,760.00            | 533          |
| <b>2019</b>                         | <b>\$302,773,970.00</b>   | <b>30021</b> |
| <b>CSIX/ARP/PI</b>                  | <b>\$275,066,375.00</b>   | <b>27267</b> |
| CCIC                                | \$2,618,203.00            | 184          |
| CICNJ                               | \$6,335,054.00            | 702          |
| ERII                                | \$11,593,477.00           | 1323         |
| FIC-D                               | \$241,187,027.00          | 23734        |
| PACIFICPI                           | \$105,626.00              | 22           |
| VIG-D                               | \$220,288.00              | 11           |
| CICC-CN                             | \$13,006,700.00           | 1291         |
| <b>New Business PI excluding DP</b> | <b>\$27,707,595.00</b>    | <b>2754</b>  |

| Year / Writing Company | Gross Written Premium | Policy Count |
|------------------------|-----------------------|--------------|
| CCIC                   | \$209,354.00          | 17           |
| CICNJ                  | \$588,605.00          | 77           |
| FIC-D                  | \$26,215,624.00       | 2562         |
| PACIFICPI              | \$5,075.00            | 2            |
| VIG-D                  | \$2,296.00            | 1            |
| CICC-CN                | \$686,641.00          | 95           |

- CSI eEXPRESS, Automated Renewal Process, and Profitability Indicator are combined all together in one chart because creating a separate chart for each application would result in triple-counting of the policy counts and gross written premiums. In other words, policies and premiums that go through one of these applications goes through the other two applications as well.
- Defined Book Run, a process within CSI eEXPRESS, is used to generate profitability analyses for informational purposes. The DBR process has been used on policies that do not reside within CSI eEXPRESS and are not included in the premium and writing company information above. For these policies outside CSI eEXPRESS, the writing company names are not captured, and the premiums actually charged are not required to be and were generally not specified, and therefore, are generally not available. DBR is not used to generate any premiums, or write any policy.
- For Corporate Business Systems (CBS), which is not a strategic business unit (SBU), the following application uses Blaze Advisor® software: Premium Booking. The approximate gross written premiums and policy counts that used these applications, in connection with which the Blaze Advisor® software was used, is provided in the charts below for the years requested. Discovery is continuing.

| Year | Gross Written Premium | Policy Count |
|------|-----------------------|--------------|
| 2018 | \$500,850,828.90      | 57,023       |
| 2017 | \$442,839,931.87      | 60,142       |
| 2016 | \$503,432,073.43      | 57,219       |

- The data for Premium Booking is extracted from a mainframe DB2 table that is specifically tracking the policies that passed through the Premium Booking “rules” as constructed in/using the Blaze Advisor® tool. Unfortunately, this table does not include writing company and that information could not be correlated to the policy count/gross written premium values being provided.
- For the Chubb Commercial Insurance (CCI) business unit for the years identified below (post-merger), the following applications use Blaze Advisor® software: CUW-IM, TAPS, and IRMA. The approximate gross written premiums, policy counts, and identification of the insurance writing companies that issued insurance policies that used these applications, in connection with which the Blaze Advisor® software was used, is provided in the charts below for the years requested. Discovery is continuing.

- For CUW-IM:<sup>1</sup>

| YEAR | WRITING COMPANY                            | POLICY COUNT | WRITTEN PREMIUM    |
|------|--|--------------|--------------------|
| 2016 | CHUBB CUSTOM INSURANCE COMPANY             | 2,127        | \$217,444,131.00   |
|      | CHUBB DE MEXICO COMPAÑIA DE SEGUROS, S.A.  | 8            | \$41,810.00        |
|      | CHUBB EUROPEAN GROUP SE                    | 44           | \$260,360.00       |
|      | CHUBB INDEMNITY INSURANCE COMPANY          | 4,475        | \$515,778,122.00   |
|      | CHUBB INSURANCE AUSTRALIA LIMITED          | 6            | \$223,981.00       |
|      | CHUBB INSURANCE COMPANY LIMITED            | 4            | \$10,686.00        |
|      | CHUBB INSURANCE COMPANY OF CANADA          | 7            | \$173,352.00       |
|      | CHUBB INSURANCE COMPANY OF NEW JERSEY      | 3,635        | \$69,278,561.00    |
|      | CHUBB NATIONAL INSURANCE COMPANY           | 1,223        | \$50,975,438.00    |
|      | CHUBB SEGUROS BRASIL, S.A.                 | 2            | \$4,281.00         |
|      | EXECUTIVE RISK INDEMNITY INC.              | 13           | \$2,167,006.00     |
|      | EXECUTIVE RISK SPECIALTY INSURANCE COMPANY | 28           | \$4,528,627.00     |
|      | FEDERAL INSURANCE COMPANY                  | 141,235      | \$4,800,540,559.00 |
|      | GREAT NORTHERN INSURANCE COMPANY           | 30,523       | \$868,809,231.00   |
|      | PACIFIC INDEMNITY COMPANY                  | 4,568        | \$426,214,814.00   |
|      | VIGILANT INSURANCE COMPANY                 | 6,478        | \$307,080,046.00   |
|      | ACE American Insurance Co                  | 2,890        | \$108,983,073.98   |
|      | ACE Fire Underwriters Ins                  | 38           | \$1,092,991.43     |
|      | ACE Property and Casualty                  | 768          | \$106,304,729.88   |
|      | Illinois Union Insurance                   | 1,183        | \$81,709,115.00    |
|      | Indemnity Insurance Co of                  | 97           | \$17,014,247.06    |
|      | Pacific Employers Insurance                | 6            | \$469,700.00       |
|      | Westchester Surplus Lines                  | 132          | \$12,587,416.00    |
|      | WFIC for Bus.Eff.1/1/11                    | 1,010        | \$31,266,954.00    |
| 2017 | CHUBB CUSTOM INSURANCE COMPANY             | 1,119        | \$125,046,576.00   |
|      | CHUBB DE MEXICO COMPAÑIA DE SEGUROS, S.A.  | 2            | \$12,403.00        |
|      | CHUBB EUROPEAN GROUP SE                    | 40           | \$368,955.00       |
|      | CHUBB INDEMNITY INSURANCE COMPANY          | 5,986        | \$581,425,852.00   |
|      | CHUBB INSURANCE AUSTRALIA LIMITED          | 2            | \$5,554.00         |
|      | CHUBB INSURANCE COMPANY LIMITED            | 3            | \$7,913.00         |
|      | CHUBB INSURANCE COMPANY OF CANADA          | 2            | \$14,184.00        |
|      | CHUBB INSURANCE COMPANY OF NEW JERSEY      | 3,432        | \$65,809,698.00    |
|      | CHUBB NATIONAL INSURANCE COMPANY           | 1,906        | \$68,554,767.00    |
|      | CHUBB SEGUROS BRASIL, S.A.                 | 2            | \$16,297.00        |
|      | EXECUTIVE RISK INDEMNITY INC.              | 11           | \$2,732,882.00     |
|      | EXECUTIVE RISK SPECIALTY INSURANCE COMPANY | 11           | \$1,102,030.00     |
|      | FEDERAL INSURANCE COMPANY                  | 147,481      | \$5,098,798,285.00 |
|      | GREAT NORTHERN INSURANCE COMPANY           | 31,605       | \$912,720,319.00   |
|      | PACIFIC INDEMNITY COMPANY                  | 4,825        | \$468,474,693.00   |
|      | VIGILANT INSURANCE COMPANY                 | 6,461        | \$324,338,205.00   |
|      | ACE American Insurance Co                  | 8,243        | \$354,885,926.81   |
|      | ACE Fire Underwriters Ins                  | 53           | \$1,722,590.00     |
|      | ACE Property and Casualty                  | 2,413        | \$248,919,844.00   |

<sup>1</sup> We understand that this financial information includes policies that were brought in under a system that includes policies that are renewed using Blaze, but automatically at the same time includes the prior transaction involving the same policy regardless whether it uses Blaze. We are seeking a way to not include the prior policy since it results in the financial information having inflated numbers.

| YEAR | WRITING COMPANY                            | POLICY COUNT | WRITTEN PREMIUM    |
|------|--|--------------|--------------------|
|      | Illinois Union Insurance                   | 3,444        | \$255,341,641.00   |
|      | Indemnity Insurance Co of                  | 281          | \$21,351,439.00    |
|      | Pacific Employers Insurance                | 21           | \$869,381.00       |
|      | Westchester Surplus Lines                  | 476          | \$45,285,709.00    |
|      | WFIC for Bus.Eff.1/1/11                    | 2,246        | \$67,191,783.00    |
| 2018 | CHUBB CUSTOM INSURANCE COMPANY             | 610          | \$68,563,377.00    |
|      | CHUBB DE MEXICO COMPAÑIA DE SEGUROS, S.A.  | 1            | \$16,435.00        |
|      | CHUBB EUROPEAN GROUP SE                    | 16           | \$85,623.00        |
|      | CHUBB INDEMNITY INSURANCE COMPANY          | 4,962        | \$443,033,892.00   |
|      | CHUBB INSURANCE AUSTRALIA LIMITED          | 1            | \$25,208.00        |
|      | CHUBB INSURANCE COMPANY LIMITED            | 1            | \$6,135.00         |
|      | CHUBB INSURANCE COMPANY OF CANADA          | 1            | \$6,754.00         |
|      | CHUBB INSURANCE COMPANY OF NEW JERSEY      | 1,799        | \$32,946,513.00    |
|      | CHUBB NATIONAL INSURANCE COMPANY           | 1,582        | \$66,309,955.00    |
|      | CHUBB SEGUROS BRASIL, S.A.                 | 1            | \$642.00           |
|      | EXECUTIVE RISK INDEMNITY INC.              | 6            | \$1,661,561.00     |
|      | EXECUTIVE RISK SPECIALTY INSURANCE COMPANY | 3            | \$213,165.00       |
|      | FEDERAL INSURANCE COMPANY                  | 90,925       | \$3,558,748,157.00 |
|      | GREAT NORTHERN INSURANCE COMPANY           | 22,807       | \$710,266,687.00   |
|      | PACIFIC INDEMNITY COMPANY                  | 3,356        | \$369,995,206.00   |
|      | VIGILANT INSURANCE COMPANY                 | 4,193        | \$227,639,141.00   |
|      | ACE American Insurance Co                  | 6,740        | \$274,751,661.00   |
|      | ACE Fire Underwriters Ins                  | 38           | \$1,498,240.00     |
|      | ACE Property and Casualty                  | 1,971        | \$191,070,156.00   |
|      | Illinois Union Insurance                   | 3,372        | \$240,820,970.00   |
|      | Indemnity Insurance Co of                  | 175          | \$13,196,308.00    |
|      | Pacific Employers Insurance                | 14           | \$51,084.00        |
|      | Westchester Surplus Lines                  | 602          | \$49,388,448.00    |
|      | WFIC for Bus.Eff.1/1/11                    | 1,273        | \$36,242,321.00    |
| 2019 | CHUBB CUSTOM INSURANCE COMPANY             | 43           | \$6,693,927.00     |
|      | CHUBB INDEMNITY INSURANCE COMPANY          | 486          | \$50,083,542.00    |
|      | CHUBB INSURANCE COMPANY OF NEW JERSEY      | 97           | \$2,469,028.00     |
|      | CHUBB NATIONAL INSURANCE COMPANY           | 124          | \$6,526,910.00     |
|      | FEDERAL INSURANCE COMPANY                  | 6,032        | \$417,370,954.00   |
|      | GREAT NORTHERN INSURANCE COMPANY           | 1,745        | \$97,044,347.00    |
|      | PACIFIC INDEMNITY COMPANY                  | 233          | \$39,736,490.00    |
|      | VIGILANT INSURANCE COMPANY                 | 220          | \$25,155,354.00    |
|      | ACE American Insurance Co                  | 374          | \$13,255,599.00    |
|      | ACE Fire Underwriters Ins                  | 2            | \$185,620.00       |
|      | ACE Property and Casualty                  | 23           | \$7,502,715.00     |
|      | Illinois Union Insurance                   | 270          | \$24,843,797.00    |
|      | Indemnity Insurance Co of                  | 4            | \$66,049.00        |
|      | Westchester Surplus Lines                  | 3            | \$538,022.00       |
|      | WFIC for Bus.Eff.1/1/11                    | 18           | \$174,830.00       |

- **For TAPS:**

| YEAR | WRITING COMPANY                   | POLICY COUNT | WRITTEN PREMIUM |
|------|-----------------------------------|--------------|-----------------|
| 2016 | CHUBB INDEMNITY INSURANCE COMPANY | 207          | \$73,264,108.51 |

| YEAR | WRITING COMPANY                   | POLICY COUNT | WRITTEN PREMIUM  |
|------|-----------------------------------|--------------|------------------|
|      | CHUBB NATIONAL INSURANCE COMPANY  | 7            | \$561,041.00     |
|      | FEDERAL INSURANCE COMPANY         | 536          | \$143,625,269.12 |
|      | GREAT NORTHERN INSURANCE COMPANY  | 20           | \$8,309,789.00   |
|      | PACIFIC INDEMNITY COMPANY         | 79           | \$42,217,709.72  |
|      | VIGILANT INSURANCE COMPANY        | 47           | \$17,102,989.00  |
| 2017 | CHUBB INDEMNITY INSURANCE COMPANY | 239          | \$45,571,577.11  |
|      | CHUBB NATIONAL INSURANCE COMPANY  | 10           | \$1,864,828.00   |
|      | FEDERAL INSURANCE COMPANY         | 496          | \$144,179,731.68 |
|      | GREAT NORTHERN INSURANCE COMPANY  | 14           | \$5,976,054.00   |
|      | PACIFIC INDEMNITY COMPANY         | 88           | \$45,768,062.54  |
|      | VIGILANT INSURANCE COMPANY        | 34           | \$8,858,947.00   |
| 2018 | CHUBB INDEMNITY INSURANCE COMPANY | 248          | \$39,388,714.07  |
|      | CHUBB NATIONAL INSURANCE COMPANY  | 23           | \$5,073,844.00   |
|      | FEDERAL INSURANCE COMPANY         | 484          | \$123,103,492.27 |
|      | GREAT NORTHERN INSURANCE COMPANY  | 18           | \$5,192,985.00   |
|      | PACIFIC INDEMNITY COMPANY         | 78           | \$37,960,159.00  |
|      | VIGILANT INSURANCE COMPANY        | 19           | \$5,771,749.00   |
| 2019 | CHUBB INDEMNITY INSURANCE COMPANY | 15           | \$428,683.00     |
|      | CHUBB NATIONAL INSURANCE COMPANY  | 3            | \$27,056.00      |
|      | FEDERAL INSURANCE COMPANY         | 54           | \$5,438,248.00   |
|      | PACIFIC INDEMNITY COMPANY         | 13           | \$1,779,809.00   |
|      | VIGILANT INSURANCE COMPANY        | 4            | \$578,262.00     |

- For IRMA:

| YEAR | WRITING COMPANY                           | POLICY COUNT | WRITTEN PREMIUM |
|------|---|--------------|-----------------|
| 2016 | ALBANY INSURANCE COMPANY                  | 1            | \$7,252.00      |
|      | CHUBB CUSTOM INSURANCE COMPANY            | 92           | \$615,040.00    |
|      | CHUBB DE MEXICO                           | 2            | \$19,419.68     |
|      | CHUBB DE MEXICO COMPAÑIA DE SEGUROS, S.A. | 4            | \$5,451.43      |
|      | CHUBB INSURANCE AUSTRALIA LIMITED         | 7            | \$33,636.74     |
|      | CHUBB INSURANCE COMPANY LIMITED           | 6            | \$3,758.22      |
|      | CHUBB INSURANCE COMPANY OF CANADA         | 1815         | \$10,045,178.53 |
|      | CHUBB INSURANCE COMPANY OF NEW JERSEY     | 253          | \$1,108,829.00  |
|      | FEDERAL INSURANCE COMPANY                 | 11876        | \$68,744,410.52 |
|      | GREAT NORTHERN INSURANCE COMPANY          | 3839         | \$17,031,473.49 |
|      | PACIFIC INDEMNITY COMPANY                 | 459          | \$3,894,125.04  |
|      | SELF-INSURED RETENTION                    | 1            | \$750.00        |
|      | VIGILANT INSURANCE COMPANY                | 714          | \$3,757,327.16  |
| 2017 | CHUBB CUSTOM INSURANCE COMPANY            | 6            | \$13,803.00     |
|      | CHUBB DE MEXICO                           | 1            | \$7,175.34      |
|      | CHUBB DE MEXICO COMPAÑIA DE SEGUROS, S.A. | 2            | \$4,582.26      |
|      | CHUBB EUROPEAN GROUP SE                   | 1            | \$32,575.09     |
|      | CHUBB INSURANCE AUSTRALIA LIMITED         | 2            | \$10,500.40     |
|      | CHUBB INSURANCE COMPANY LIMITED           | 4            | \$15,067.52     |
|      | CHUBB INSURANCE COMPANY OF CANADA         | 1863         | \$10,196,153.18 |
|      | CHUBB INSURANCE COMPANY OF NEW JERSEY     | 248          | \$889,740.00    |
|      | FEDERAL INSURANCE COMPANY                 | 11534        | \$66,294,342.58 |

| YEAR | WRITING COMPANY                       | POLICY COUNT | WRITTEN PREMIUM |
|------|---------------------------------------|--------------|-----------------|
|      | GREAT NORTHERN INSURANCE COMPANY      | 3723         | \$16,015,552.22 |
|      | PACIFIC INDEMNITY COMPANY             | 420          | \$2,860,462.66  |
|      | VIGILANT INSURANCE COMPANY            | 684          | \$3,348,817.42  |
| 2018 | CHUBB CUSTOM INSURANCE COMPANY        | 2            | \$4,782.00      |
|      | CHUBB INSURANCE COMPANY OF CANADA     | 1831         | \$11,668,247.00 |
|      | CHUBB INSURANCE COMPANY OF NEW JERSEY | 217          | \$966,870.00    |
|      | FEDERAL INSURANCE COMPANY             | 10318        | \$59,180,523.71 |
|      | GREAT NORTHERN INSURANCE COMPANY      | 3444         | \$15,149,787.68 |
|      | PACIFIC INDEMNITY COMPANY             | 388          | \$2,586,049.98  |
|      | VIGILANT INSURANCE COMPANY            | 644          | \$3,085,724.04  |

- ERCIS Claims is a claims system (not a policy system), and therefore, there is no gross written premium or policy count associated with the application.
- For the Surety business unit for the years identified below (post-merger), the following application does not use Blaze Advisor® software: Cornerstone. However, as ordered by the Court, below are the approximate gross written premiums, policy counts, and identification of the insurance writing company that issued insurance policies that used Cornerstone:

| Year/Writing Company        | Policy Count  | Gross Written Premium |
|-----------------------------|---------------|-----------------------|
| <b>2016</b>                 | <b>324291</b> | <b>\$237,436,826</b>  |
| Chubb Ins Co of Canada      | 13961         | \$7,408,108           |
| Federal Ins Co - Canada     | 10            | \$0                   |
| Federal Insurance Co        | 285113        | \$220,608,093         |
| Great Northern Insurance Co | 18            | \$0                   |
| Pacific Indemnity Co        | 7427          | \$5,000,954           |
| Vigilant Insurance Co       | 17762         | \$4,419,671           |
| <b>2017</b>                 | <b>318828</b> | <b>\$259,641,111</b>  |
| Chubb Ins Co of Canada      | 13966         | \$11,328,070          |
| Federal Insurance Co        | 280763        | \$235,297,734         |
| Great Northern Insurance Co | 20            | \$670                 |
| Pacific Indemnity Co        | 7309          | \$9,784,435           |
| Vigilant Insurance Co       | 16770         | \$3,230,203           |
| <b>2018</b>                 | <b>303229</b> | <b>\$137,058,165</b>  |
| Chubb Ins Co of Canada      | 21276         | \$14,657,186          |
| Federal Insurance Co        | 261448        | \$116,145,727         |
| Great Northern Insurance Co | 37            | \$1,205               |
| Pacific Indemnity Co        | 6540          | \$4,497,351           |
| Vigilant Insurance Co       | 13928         | \$1,756,697           |

Dated: July 16, 2019

s/Terrence J. Fleming

Terrence J. Fleming (#0128983)

tfleming@fredlaw.com

Leah Janus (#0337365)

ljanus@fredlaw.com

Christopher D. Pham (#0390165)

cpham@fredlaw.com

**FREDRIKSON & BYRON, P.A.**

200 South Sixth Street, Suite 4000

Minneapolis, MN 55402-1425

(612) 492-7000 (tel.)

(612) 492-7077 (fax)

*Attorneys for Defendants*

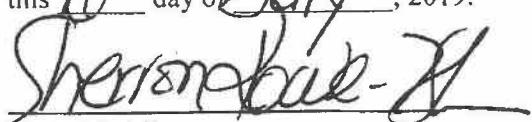
## VERIFICATION

Sarada Kotha states under oath that she is an IT Business Analyst; that she is authorized to respond to Plaintiff's Interrogatory No. 17 on behalf of Federal Insurance Company as it relates to Defined Book Run; that she has relied on directors, employees, agents, and attorneys to provide information used in formulating the answer to the above interrogatory; and that the answer is true and correct to the best of her knowledge.



Sarada Kotha

Subscribed and sworn to before me  
this 16 day of JUN, 2019.



Notary Public

SHERRON ROWE-HOHN  
Notary Public - State of New Jersey  
My Commission Expires Sep 5, 2021